

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MIGUEL RODRIGUEZ

Plaintiff,

vs.

WIDENER UNIVERSITY,
CITY OF CHESTER, PENNSYLVANIA,
DAVID COUGHLIN, DENISE GIFFORD
PATRICK SULLIVAN,
MATTHEW DONOHUE
Defendants.

CIVIL ACTION

NO. 2:13-CV-01336-JP

**ANSWER OF DEFENDANTS, WIDENER UNIVERSITY, DAVID COUGHLIN,
DENISE GIFFORD AND PATRICK SULLIVAN, TO COUNTS VI AND VII OF
PLAINTIFF'S COMPLAINT**

Defendants, Widener University, David Coughlin, Denise Gifford and Patrick Sullivan (hereinafter, "Widener Defendants"), answer Plaintiff's Complaint, Counts VI and VII, as follows:

Paragraphs 1, 5, and 7-32 are denied.

Paragraphs 2-4 and 6 are admitted.

Count VI

Paragraphs 56-67 are denied.

Count VII

Paragraphs 68-74 are denied.

First Affirmative Defense

Plaintiff fails to state a claim upon which relief can be granted.

Second Affirmative Defense

Plaintiff's claims are barred by the applicable Statute of Limitations.

Third Affirmative Defense

Plaintiff's facebook postings were available to the general public.

Fourth Affirmative Defense

Plaintiff's facebook postings were provided to Widener by third parties who had permitted access to Plaintiff's facebook postings.

Fifth Affirmative Defense

Defendants were, at all times, legally justified in taking the actions relating to Plaintiff.

Sixth Affirmative Defense

Plaintiff's claim against the Widener Defendant is frivolous and in bad faith.

WHEREFORE, the Widener Defendants demand judgment in their favor and against Plaintiff.

IMPERATRICE, AMARANT & BELL, P.C.

By: _____

ROCCO P. IMPERATRICE, III, ESQUIRE
Attorney for Widener Defendants

Dated: July 2, 2013

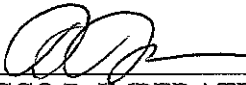
CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing *Answer of Defendants to Counts VI and VII of Plaintiff's Complaint*, upon the following via U.S. Mail, First Class, addressed as follows:

***Lewis P. Hannah, Esquire
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IMPERATRICE, AMARANT & BELL, P.C.

By: 

ROCCO P. IMPERATRICE, III, ESQUIRE
Attorney for Widener Defendants

Dated: July 2, 2013